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August 2, 2007

VIA OVERNIGHT MAIL

Honorable William H. Pauley, III
USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Cruise et al. v. Doyle et al.
       07CV3490 (WHP)

Dear Judge Pauley:

We represent the Plaintiffs, John L. Cruise, Jr. et al. in the above-referenced action. We are presently scheduled to appear before you on August 10, 2007 at 11 a.m. After consultation with the attorneys for the Defendants and pursuant to your Individual Rules, we are proposing the following litigation schedule.

a.   The initial disclosures pursuant to Rule 26(a)(i) will be made on or before October 31, 2007.

b.   Discovery will be completed on or before January 31, 2008; discovery regarding liability and damages should go forward simultaneously.

c.   Issues regarding electronically stored information: none expected to arise.

d.   Issues relating to claims of privilege: none has arisen thus far.

e.   Other changes in the limitations on discovery: none.

f.   Pursuant to Rule 16 of the Federal Rules of Civil Procedure, (1) the time to join other parties and to amend the pleading: November 1, 2007 (2) the time to file dispositive motions: January 31, 2008.

In addition, we are enclosing a courtesy copy of the Complaint in this matter.
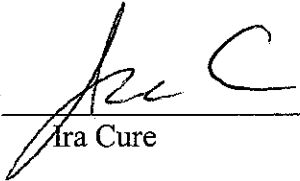
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Thank you for your attention to this matter.

Respectfully submitted,

BROACH & STULBERG, LLP

By:_____
Ira Cure

IC/ps
Enclosure

cc: Vincent F. O'Hara, Esq.(via facsimile and first class mail)
Marion M. Lim, Esq. (via facsimile and first class mail)
Frank Rinaldi, Esq. (via facsimile and first class mail)
Mr. John L. Cruise, Jr.
Mr. Brian A. Conrad
Mr. Kenneth J. Dibble
Mr. Matthew A. Eirich
Mr. Michael Kology
Mr. Peter J. Krol
Mr. Edgar Vellotti